

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

KARL JORDAN, JR., et al.,

**NOTICE OF PRETRIAL  
MOTIONS FOR  
DEFENDANT  
KARL JORDAN, JR.**

20 Cr. 305 (LDH)

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, dated April 11, 2022 and upon all prior proceedings held herein, defendant, Karl Jordan, Jr., moves before the Honorable LaShann DeArcy Hall, United States District Judge, at the United States Courthouse for the Eastern District of New York, for the following relief, orders:

1) dismissing Counts One, 21 U.S.C. § 848(e)(1)(A), and 18 U.S.C. § 2; and Count Two, 18 U.S.C. §§ 924(j)(1) and 2, because of the government's undue delay in bringing these charges against Mr. Jordan, pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A);

2) severing the above-mentioned Counts One and Two from Counts Three, 21 U.S.C. §§ 846, 841(b)(1)(A)(iii) and 841(b)(1)(C) and 18 U.S.C. § 2, Four, 18 U.S.C. § 924(c)(1)(A)(i) and 18 U.S.C. § 2, and Five through Eleven, 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2, pursuant to Federal Rules of Criminal Procedure 8(a), 12(3)(A), and 14(a); and

3) severing Mr. Jordan's trial from that of his co-defendant Ronald Washington, pursuant to Federal Rules of Criminal Procedure 12(3)(A) and 14; and *Bruton v. United States*, 391 U.S. 123 (1968), and *Crawford v. Washington*, 541 U.S. 64, 67 (2004).

Mr. Jordan also requests leave to join in his co-defendant's motions to the extent they are beneficial to his defense and such other and further relief as the Court may deem just and proper.

Dated: Brooklyn, New York  
April 11, 2022

Respectfully submitted,

/s/  
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To: Counsel of Record